

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

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<b>In Re: BP SHAREHOLDER DERIVATIVE) LITIGATION</b>	) ) ) )	<b>MDL NO. 2185</b>  <b>Civil Action No. 4:10-cv-3447</b>
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<b>In Re: BP P.L.C. SECURITIES LITIGATION</b>	) ) ) )	<b>Civil Action No. 4:10-md-2185</b>  <b>Hon. Keith P. Ellison</b>
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**DECLARATION OF DONA SZAK**

DONA SZAK, an attorney admitted to practice before this Court and a partner at Ajamie LLP, counsel for the Derivative Plaintiffs, submits this Declaration in Opposition to Defendants' Motion to Dismiss, and pursuant to 28 U.S.C. § 1746 hereby declares:


Attached hereto are true and correct copies of the following documents:

- Exhibit 1.: Bob Dudley, *Lessons of Deepwater Horizon*, Wall St. J., Apr. 20, 2011.
- Exhibit 2.: Except from Chief Counsel's Report, *National Commission on the BP Deepwater Horizon Oil Spill and Offshore Drilling* (2011).
- Exhibit 3.: Excerpts from the Jan. 26, 2011 deposition of James Wetherbee (filed under seal).
- Exhibit 4.: Order Denying Motion to Dismiss, *In re BP P.L.C. Deriv. Litig.*, No. 3AN-06 11929CI (Alaska Super. Ct. May 17, 2007).
- Exhibit 5.: BP Governance Board Performance Report (2010).
- Exhibit 6.: A document printed from the BP website entitled: "BP SEEAC Processes."
- Exhibit 7.: Notice of BP Annual General Meeting 2011.

- Exhibit 8.: A document printed from the BP website entitled: "Audit Committee Processes."
- Exhibit 9.: A document printed from the BP website entitled: "GoM Committee Process."
- Exhibit 10.: A document printed from the BP website entitled: "28th CERA Executive Conference – Opening speech to the Cambridge Energy Research Association."
- Exhibit 11.: Lamar McKay, Chairman & President, BP America Inc., Speech at Howard Weil Energy Conference: Strengthening Safety, Restoring Trust, Building Value (Mar. 28, 2011).
- Exhibit 12.: A document printed from the BP website entitled: "IOC's: a strategy for growth."
- Exhibit 13.: John M. Broder, *BP Is Fined \$25 Million for '06 Spills at Pipelines*, N.Y. Times, March 3, 2011.
- Exhibit 14.: United States v. BP Exploration (Alaska) Inc., No. 3:09-cv-00064-JWS (D. Alaska), Consent Decree [Proposed] (Filed May 3, 2011).
- Exhibit 15.: The Declaration of Stuart Adair.

Dated: May 5, 2011

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